

## PURPOSE

To ensure that Michigan Department of Health and Human Services (MDHHS) has adequate testing and revision procedures in place to support the restoration of operations, computing resources and critical data under the Disaster Recovery Plan and Emergency Mode Operations Plan in the event of an emergency.

## DEFINITIONS

**ePHI** is the acronym for Electronic Protected Health Information. It is Protected Health Information that is transmitted or maintained in electronic form.

**Contingency Plan** refers to the management policy and procedures designed to maintain and restore business operations, including computer operations possibly at an alternate location, in the event of system failures, emergencies or disasters.

**PHI** is the acronym for Protected Health Information. It is information that can identify a person and contains health related data pertaining to that person.

**Workforce Member** means employees, volunteers and other persons whose conduct, in the performance of work for a covered entity, is under the direct control of such entity, whether or not they are paid by the covered entity. This includes full and part time employees, affiliates, associates, students, volunteers and staff from third party entities who provide service to the covered entity.

## POLICY

MDHHS in conjunction with the Department of Technology, Management and Budget (DTMB) shall implement procedures for periodic testing and revision of contingency plans.

System managers, system owners and other managers must identify critical business processes, implement reasonable security procedures for critical business processes consistent with procedures employed during normal mode operations and ensure the protection of ePHI while operating in emergency mode.

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**PROCEDURE****Department of Technology, Management and Budget/Division  
Director or Section Supervisor/Manager**

Identify contingency plan elements to test: List critical files identified from the application and data criticality assessment.

List the specific objective for each test element and the overall test plan.

List each test participant, their department and the specific roles they are to perform within the test. A user role matrix could be utilized.

List the specific scenario that will be utilized for the test. Determine success criteria and fail criteria. In determining the scenarios consider both the worst-case incident and those incidents that are most likely to occur. Test scenarios should mimic reality as closely as possible. List the time frames associated with each test element and for each of the test participants.

Maintain plan in a ready state that accurately reflects system requirements, procedures, organizational structure and policies. Periodic reviews of the plan must be conducted in addition to reviews whenever there are changes affecting:

- Operational requirements.
- Security requirements.
- Technical requirements.
- Changes of hardware, software and other equipment.
- Changes with alternate facility requirements.
- Changes with team members and team members' contact information.

**Workforce Member**

Test results and lessons learned shall be documented and reviewed with the test participants and other workforce members as appropriate.

**REFERENCES**

45 CFR 164.308(a)(7)

**CONTACT**

For more information regarding this policy, contact the MDHHS Security Officer at [MDHHSPrivacySecurity@michigan.gov](mailto:MDHHSPrivacySecurity@michigan.gov).